IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

UNITED STATES OF AMER	RICA)
v.))
THE BOEING COMPANY,		No. 4:21-CR-5-O
	Defendant.)))

THE BOEING COMPANY'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTIONS FILED ON BEHALF OF CRASH VICTIMS OF LION AIR FLIGHT 610 AND ETHIOPIAN AIRLINES FLIGHT 302 AND TO RESPOND TO A THIRD-PARTY DECLARATION

The Boeing Company ("Boeing"), by and through undersigned counsel, respectfully submits this Unopposed Motion for Extension of Time to Respond to Motions Filed on behalf of Crash Victims of Lion Air Flight 610 and Ethiopian Flight 302 and to Respond to a Third-Party Declaration. *See* Dkt. Nos. 15–18, 34. In support thereof, Boeing states as follows:

- 1. On or about January 5, 2021, the United States and Boeing entered into a Deferred Prosecution Agreement (the "Agreement").
- 2. On January 7, 2021, the Agreement and related documents, including the parties' Joint Motion for Exclusion of Time Under the Speedy Trial Act (the "Joint Motion"), were filed publicly with this Court. Dkt. Nos. 1–5.
- 3. On January 24, 2021, this Court granted the parties' Joint Motion and ordered that all further criminal proceedings in this matter be continued until further motion of the parties. Dkt. No. 13.
- 4. On December 16, 2021, three motions and accompanying exhibits (collectively, the "Motions") were filed on behalf of fifteen victims of Lion Air Flight 610 and Ethiopian Airlines

Flight 302, and others similarly situated, seeking various relief under the Crime Victims' Rights Act, 18 U.S.C. § 3771. Dkt. Nos. 15–18.

- 5. On December 22, 2021, the Court granted Boeing's first motion for an unopposed extension of time to file a response to the Motions based on the approaching holiday season and to conform Boeing's response deadline to that of the United States, and required Boeing to respond by January 13, 2022. Dkt. No. 29.
- 6. On January 11, 2022, the Court ordered the United States, Boeing, and the movants to respond to the declaration of a third-party by January 18, 2022. Dkt. No. 34.
- 7. The same day, the Court granted the United States' unopposed motion for an extension of time to file its response to the Motions and its response to the third-party declaration, and required the United States to file its responses to both the Motions and the third-party declaration by January 20, 2022. Dkt. No. 36.
- 8. Accordingly, to again conform Boeing's response deadline to that of the United States to allow for efficient proceedings, Boeing respectfully requests an extension to the period of time within which it may respond to the Motions and the third-party declaration, until January 20, 2022. This request is not opposed by the movants, the United States, or counsel for the third-party declarant.

* * * * *

CONCLUSION

Based on the foregoing, Boeing respectfully requests that the Court grant its Unopposed Motion for Extension of Time to Respond and extend the period of time within which Boeing may respond to the Motions and the third-party declaration until January 20, 2022.

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

Pursuant to Local Criminal Rule 47.1(b), on January 11, 2022, counsel for Boeing conferred with counsel for the movants, Paul G. Cassell, Esq., counsel for the United States, Cory E. Jacobs, Esq., and counsel for the third-party declarant, Marianne Auld, Esq., who each stated that they are unopposed to this motion.

/s/Benjamin L. Hatch

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